

COHEN & GREEN

August 8, 2022

Hon. Lois Bloom, U.S.M.J.
United States District Court for the Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

By Electronic Filing.

Re: Case No. 1:19-cv-02170-EK-LB, Rudler v. MLA Law Offices, LTD et al.

Dear Judge Bloom:

As the Court may recall, my firm represents the Plaintiff in the case above. I write to make a small correction to the letter filed yesterday (Dkt. No. 113), seeking to have the Court deny Defendants' motion at Dkt. No. 112 and set a new deadline for post-judgment discovery instead.

In trading emails and various version of the extension letter at Dkt. No. 112, Defendants sent the draft they ultimately filed along with an email stating "I have attached a revised version which incorporated much of your points. As a courtesy I am sending it to you now, but I intend to file this asap" (all text as in original), and did not include a redline or other indication of the changes made. I briefly reviewed it to make sure it incorporated our substantive changes, which it appeared to — including the specific reference to the "settlement and the related attorneys' fee award and judgment." Dkt. No. 112 at 1; Dkt. No. 113 at 3. However, I did not catch that Defendants had reverted my change of "settlement amount" to "judgment and settlement." Thus, the line in my letter that says, "Put directly, the letter states that Defendants will be making payments 'towards the balance of the judgment and the settlement'" is inaccurate in describing Defendants' actual letter.

I apologize for the error. I was officiating a wedding yesterday, and felt the need to get the letter in before the business day began today. That said, I do not think the minor error influences the ultimate conclusion in any way: assuming the Court takes Defendants' statements at face value, there is no agreement on any extension.

As ever, we thank the Court for its time and consideration.

Respectfully submitted,

/s/

J. Remy Green

Honorific/Pronouns: Mx., they/their/them

COHEN & GREEN P.L.L.C.

Attorneys for Plaintiff



1639 Centre St., Suite 216
Ridgewood, New York 11385

cc:
All parties by ECF.